

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ERIK SHEEHAN,
Plaintiff

v.

VERIZON COMMUNICATIONS, INC.,
Defendant

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)
) CIVIL ACTION NO.: 04CV12364JGD
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PLAINTIFF'S MOTION TO COMPEL DISCOVERY

The Plaintiff hereby moves this Honorable Court to compel the production of certain documents which have been withheld. Namely, the Plaintiff requests that this Honorable Court compel the Defendant to produce (1) Linda Richelson's personnel folder; (2) Paul McGovern's earlier drafts of the Defendant's Position Statement to the Massachusetts Commission Against Discrimination; (3) the complete chain of emails between Carolyn Driscoll, Mary E. Leone, Lisa Damask, Erik Sheehan, and Doug Wilder in March, 2002; (4) the earlier draft of a letter to Erik Sheehan from Doug Wilder drafted by Carolyn Driscoll in approximately June, 2002 referenced in an email; and (5) Erik Sheehan's **midyear** review which was completed while he was working for Linda Richelson.

In support of his motion, the Plaintiff relies upon the Plaintiff's Memorandum in Support of His Motion to Compel filed together with this Motion and incorporated herein.

Respectfully submitted,

Erik Sheehan

by his attorney,

/s/ Paul Tuttle
Paul Tuttle (BBO# 661786)
Domenic Finelli (BBO# 165450)
Law Offices of Domenic Finelli
199 Revere Street
Revere, MA 02151
(781) 286-1484

Dated: November 10, 2005

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1, the Plaintiff requests an oral argument on his Motion, and states that the hearing on his Motion should not take more than 30 minutes.

/s/ Paul Tuttle

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) AND 37.1(A)

Pursuant to Local Rules 7.1(A)(2) and 37.1(A), I, Paul Tuttle, hereby certify that on October 26, 2005 at approximately 11:30 a.m., at 199 Revere Street, Revere, Massachusetts, I conferred with Windy L. Rosebush, Esq., counsel for the Defendant in a good faith attempt to resolve or narrow the discovery issues to greatest possible extent.

/s/ Paul Tuttle

CERTIFICATE OF SERVICE

The foregoing Motion to Compel was served upon counsel for the Defendant on this 10th day of November, 2005 by electronically filing the same.

_____/s/ Paul Tuttle